

EXHIBIT C

CASE NAME: UBER; USDC CASE NUMBER 3:23-md-03084-CRB

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4 Attorney for 7x7 EXPERIENCE

5 UNITED STATES DISTRICT COURT

6 NORTHERN DISTRICT OF CALIFORNIA

7 IN RE: UBER TECHNOLOGIES, INC., PASSENGER
SEXUAL ASSAULT LITIGATION

Civil Action No. 3:23-md-03084-CRB

8 THIS DOCUMENT REALTES TO: ALL CASES

9 SUPPLEMENTAL OBJECTIONS OF 7X7
EXPERIENCE TO SUBPOENA DUCES TECUM

10 Pursuant to Federal Rules of Civil Procedure [“FRCP”] Rule 45(d)(2)(B), 7X7
11 EXPERIENCE [“7x7”] objects to Plaintiffs’ subpoena duces tecum in these Supplemental
12 Objections. These objections supplement and incorporate by reference our prior objections
13 served on 05/07/2024 (the “Initial Objections”).

14 7x7 objects to the validity of the service of process attempted by Plaintiff under FRCP
15 Rule 45(b)(1) on the grounds that the attempted service was made on an individual residing in a
16 property owned by an authorized agent of 7x7, but who does not represent and is not authorized
17 to accept service on behalf of 7x7. Further, Plaintiff subsequently failed to serve amended
18 details of the subpoena on 7x7, including a revised response date from 05/08/2024 to
19 05/31/2024, resulting in undue burden of response on 7x7. Together, these errors constitute a
20 failure of proper service of process on 7x7.

21 In addition to the objections raised in the Initial Objections and 7x7’s objections on
22 service of process, 7x7 objects to the subpoena on the following grounds:

23 1. The discovery sought is unduly burdensome, unreasonably cumulative and
24 duplicative because it can be obtained from the Defendant. The subpoena is an

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1 attempt to avoid the normal discovery process and places an undue burden on non-
2 parties. (*Nidec Corp. v. Victor Co. of Japan, Ltd.*, 249 F.R.D. 575 (N.D. Cal. 2007);
3 *Moon v. SCP Pool Corp.*, 232 F.R.D. 633 (C.D. Cal. 2005).)

4
5 2. 7x7 does not offer any products that address or pertain to sexual assault and
6 therefore has not provided any products to the Defendant on this subject. For this
7 reason alone, 7x7 is not aware of any communications, documents or other materials
8 related to the Defendant that would be of relevance in this matter.

9
10 On the basis of 7x7's Initial Objections and these Supplemental Objections, 7x7 does
11 not intend to produce any documents responsive to the subpoena, and we respectfully request
12 Plaintiff to withdraw the subpoena.

13 DATED: 05/22/2024

14 
15 ALLYSON BROWNE, ESQ., pro hac vice
16 Attorneys for Respondent, 7x7 EXPERIENCE

17 SUPPLEMENTAL OBJECTIONS TO UBER CASE SUBPOENA

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1 STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

2 I am over the age of 18 years, and not a party to this action. My business address is 1730 Clement Street,
3 San Francisco, California, 94121, which is in San Francisco County, California.

4 On 05/22/2024, the document named below will be served on the parties in this action as follows:

5 **DOCUMENT SERVED:** **OBJECTIONS OF 7X7 EXPERIENCE
TO SUBPOENA DUCES TECUM**

6 **SERVED UPON:** **SEE BELOW**

7 X (By Electronic Mail Where Indicated) I verify that the above-referenced document will be transmitted via
8 electronic service to the parties named below on 05/22/2024.

9
10
11
12 By: Allyson Browne, Esq.
13
14 By email:
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